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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILLO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687

**EXPERT DECLARATION OF HANNAH
POSTEL IN SUPPORT OF
PLAINTIFFS' MOTION TO POSTPONE
EFFECTIVE DATE OF AGENCY
ACTION**

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EXPERT DECLARATION OF HANNAH POSTEL

1
2 1. I, Hannah Postel, am an Assistant Professor of Public Policy at Duke University. If called
3 to testify, I could and would do so as follows:
4

5 2. I have been asked to provide an expert opinion on the impact of terminating Temporary
6 Protected Status (TPS) for Hondurans. I make this declaration based on my personal and professional
7 knowledge, my skill, experience, training, and education, and facts and data regularly relied upon in
8 my field that are currently available to me. If additional information becomes available, or if I believe
9 it would be appropriate to respond to any critique or contrary theories, I will advise Plaintiffs' counsel
10 that I intend to do so and will seek their help in following the appropriate judicial procedures. The
11 opinions in this declaration are my own.

12 3. I am an Assistant Professor of Public Policy at Duke University. I am also a faculty affiliate
13 of the Duke Center for International Development, the Duke University Population Research Institute,
14 and the Stanford Immigration Policy Lab. I hold a Ph.D. in Demography and Social Policy from
15 Princeton University and a B.A. in international politics and economics from Middlebury College. I
16 have received grants from the National Science Foundation and the Russell Sage Foundation, among
17 others. A true and correct copy of my curriculum vitae is attached as Appendix A.
18

19 4. My research focuses on the causes and consequences of historical immigration
20 restrictions in the United States, as well as the relationship between economic development and
21 migration in the Global South. I have published this work in leading economics and demography
22 journals including the *American Economic Review* and *Population and Development Review*.

23 5. I have conducted extensive field research in Latin America, including ongoing research
24 on return migration from the United States to Honduras. I have also served as an expert consultant on
25 migration and development policy for international organizations including the International
26 Organization for Migration.
27

28 **I. TPS BACKGROUND**

1 6. Temporary Protected Status (TPS) was created by Congress in 1990 to assist
2 individuals from specifically designated countries that are dealing with ongoing armed conflict,
3 environmental disasters, and/or other extraordinary, temporary conditions. TPS does not apply to new
4 immigrants; only individuals already present in the United States when the government designates
5 their country of origin eligible may receive protection. Individuals must also meet certain conditions
6 including criminal background assessments and pay application fees.

7 7. TPS designations generally last from 6 to 18 months and provide two key protections:
8 1) protection from removal/deportation, and 2) authorization to work legally in the United States. TPS
9 does not provide a pathway to permanent residence/citizenship, nor does it allow recipients' family
10 members to join them in the United States.

11 8. According to the American Immigration Council, approximately 1.1 million people
12 held TPS as of September 30, 2024. Since that date, the Trump administration has terminated TPS for
13 up to 350,000 Venezuelans and announced forthcoming termination for an additional 21,000 people.
14 (American Immigration Council, 2025).

15 9. With the termination of TPS, individuals revert to whatever immigration status they
16 would have absent temporary protection. While some recipients may have secured different legal
17 status during their TPS period—through successful asylum cases or permanent residency via family
18 members—many become unauthorized upon termination, losing both work permission and
19 deportation protection. If TPS holders who entered the U.S. without inspection choose to leave upon
20 termination, they may be subject to a ten-year bar on re-entry, even if they are otherwise eligible for
21 legal permanent residence pathways.

22 **II. TPS FOR HONDURANS**

23 10. Honduras was originally designated for TPS on January 5, 1999. This followed
24 nationwide devastation from Hurricane Mitch in October 1998, which killed over 5,600 Hondurans
25 and left 1.4 million homeless. The initial designation extended protection to nearly 105,000 Hondurans
26 (DHS, 2018).

11. Honduras has maintained TPS continuously for over 25 years, making it the longest-standing TPS population in the United States. The designation has been extended thirteen consecutive times based on not only Hurricane Mitch's lasting effects but also subsequent natural disasters including hurricanes, tropical storms, flooding, and severe drought. Additionally, in the most recent extension (June 2023), DHS cited violence and sociopolitical concerns that have adversely impacted living conditions and hindered recovery from environmental disasters (DHS, 2023). All Honduran TPS holders have resided in the U.S. for 25 years or more, by definition. As of September 30, 2024, approximately 52,585 Hondurans held TPS (National Immigration Forum, 2025).

12. TPS serves a distinct protective function for Hondurans that cannot be replaced by other immigration pathways. While asylum protects against targeted individual persecution, TPS for Honduras addresses widespread environmental disasters and generalized violence that threaten the safety of most Honduran citizens. At the end of 2023, Hondurans had the second largest backlog in asylum cases, with at least 95,584 individuals still with pending cases (Transactional Records Access Clearinghouse, 2024). In fiscal year 2024, pending Honduran asylum cases had been waiting an average of 1,289 days since their Notice to Appear was filed—over three and a half years—with no resolution in sight (ibid).

III. US ECONOMIC IMPACTS

13. Research demonstrates the significant economic contributions of TPS holders to the United States. An analysis by the Immigrant Legal Resource Center found that TPS holders from El Salvador, Honduras, and Haiti earned \$4.5 billion annually and contributed \$691 million per year to Social Security and Medicare in 2015 (Baran et al., 2017). By 2021, economic contributions had grown substantially; 354,000 TPS holders from 12 countries earned \$10.3 billion annually and contributed \$2.2 billion in federal and state taxes (American Immigration Council, 2023). Workers with TPS earn 13% more than those without legal status, and women with TPS are 17% more likely to be employed compared to unauthorized workers (Orrenius and Zavodny, 2015).

14. Honduran TPS holders demonstrate strong economic integration and workforce participation. 85% of Honduran TPS holders participate in the labor force—substantially higher than the overall U.S. population (63%). Only 4% of Honduran TPS holders are unemployed, matching the

1 national average. Honduran TPS households have a median income of \$40,000, with 76% of
2 households having incomes above the poverty level. The largest populations reside in Texas (8,500),
3 Florida (7,800), North Carolina (6,200), and California (5,900) (Warren and Kerwin, 2017).

4 15. Hondurans contribute to essential industries across the United States, with the largest
5 concentrations in construction (13,700), child day care services (3,900), landscaping services (3,700),
6 and restaurants and food services (3,300). Nearly one-quarter (22%) of Honduran TPS households
7 have mortgages, indicating homeownership and community investment. Additionally, 85% speak at
8 least some English, with 44% speaking English well, very well, or only English (ibid).

9 16. Honduran TPS holders have deep family ties in the United States. They have 53,500
10 U.S.-born children who are American citizens, and 23% of the total population arrived as children
11 under age

12 17. Historical evidence shows that ending long-standing temporary immigration programs
13 often fails to achieve stated objectives. My research on the termination of the Mexican *bracero*
14 program examined what happened when the United States ended a temporary worker program for
15 approximately half a million Mexican agricultural workers. The program had operated for over two
16 decades. I found that excluding Mexican workers in 1965 did not increase wages or employment for
17 U.S.-born workers. Instead, farms mechanized (Clemens, Lewis, and Postel 2018). This demonstrates
18 that immigration restrictions targeting established temporary populations can have unintended
19 consequences that differ from policymakers' expectations.

20 18. Terminating TPS for Hondurans would impose significant economic costs on the
21 United States. If Hondurans lose TPS status, they will either be deported or remain in the country
22 without legal authorization. If deported, they will no longer contribute to the U.S. economy. If they
23 remain and work without authorization, they may earn less and contribute less economically than they
24 would with TPS status. Additionally, employers would face substantial costs replacing trained
25 workers.

26 19. The government would also incur substantial deportation expenses. Baran et al. (2017)
27 estimate a per-immigrant deportation cost of \$10,070. Adjusted for inflation to 2025 using the Bureau
28

1 of Labor Statistics CPI calculator, this cost rises to \$13,700 per person. Deporting approximately
2 52,585 Honduran TPS holders could therefore cost taxpayers an estimated \$720 million.

3 **IV. HONDURAS COUNTRY CONTEXT**

4 20. In June 2023, DHS extended TPS for Honduras through July 2025, finding that
5 extraordinary conditions preventing safe return continue to exist. "Repetitive cycles" of storm-related
6 damages have damaged roads, collapsed bridges, devastated crops, flooded houses, and caused
7 landslides in 16 of 18 departments. In the extension, DHS cited ongoing food insecurity affecting
8 millions of Hondurans, inadequate medical infrastructure, and persistent violence that continues to
9 hinder recovery from environmental disasters. DHS also noted that Honduras reported the highest
10 number of severe dengue fever cases in the Americas in 2020 and 2021, and found that medical care
11 "varies greatly in quality and availability" outside major cities (DHS, 2023).

12 21. Environmental disasters continue displacing Hondurans, with nearly 250,000 internally
13 displaced and another 183,000 migrating internationally (UNHCR, 2021; UNICEF, 2020). The
14 homicide rate remains 25.3 murders per 100,000 people—more than four times the global average
15 (InSight Crime, 2024; UNSD, 2024). More than 60 percent of Hondurans live in poverty, with 19
16 percent of children under 5 suffering from malnutrition (WFP, 2024).

17 22. My research on return migration shows why Honduras cannot safely accommodate TPS
18 holders. Between 2016 and 2024, over 500,000 Hondurans were returned to their country, primarily
19 from the United States and Mexico (SEDESOL, 2025). These returnees face significant challenges
20 including low educational attainment, limited formal work experience, lack of access to public
21 services, and high levels of stigmatization. Recent cases highlight the deadly risks returnees face: two
22 recently deported Hondurans were killed in less than a week in early 2025 (La Tribuna, 2025). Many
23 returnees avoid returning to their home municipalities due to these security concerns (SEDESOL,
24 2025). My earlier research documented that violence remains a significant but often underreported
25 factor driving migration from Honduras (Clemens and Postel, 2017).
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